

1      **CHRISTENSEN JAMES & MARTIN**  
2      KEVIN B. CHRISTENSEN, ESQ.  
3      Nevada Bar No. 00175  
4      EVAN L. JAMES, ESQ.  
5      Nevada Bar No. 007760  
6      LAURA J. WOLFF, ESQ.  
7      Nevada Bar No. 006869  
8      7440 W. Sahara Ave.  
9      Las Vegas, NV 89117  
10     (702) 255-1718  
11     Attorneys for Plaintiffs

7                   **UNITED STATES DISTRICT COURT**  
8                   **DISTRICT OF NEVADA**

9      Painters Joint Committee, through its designated  
10     fiduciaries, John Smirk and Thomas Pfundstein;  
11     IUPAT Industry Pension Fund; Employee Painters'  
12     Trust; Painters Vacation-Holiday Savings Fund;  
13     Painters Joint Apprenticeship and Journeyman  
14     Training Trust; Painters Industry Promotion Fund;  
15     Painters JCIP Fund; Painters Organizing Fund; and  
16     Painters Labor Management Contract Fund,

17                   Plaintiffs,

18                   vs.

19      J.L. Wallco, Inc. dba Wallternatives, a Nevada  
20     corporation; Genuine Quality Coatings, Inc., a  
21     Nevada Corporation; Sunrise Painting/RCH, Inc., a  
22     Nevada Corporation; Richard Rejan Nieto,  
23     individually and dba Genuine Quality Coatings,  
24     Inc.; Claudia Bammer aka Claudia Nieto, an  
25     individual; Richard Raoul Nieto, an individual;  
26     Shrader and Martinez Construction Inc., a Nevada  
27     corporation; Merchants Bonding Company; Great  
28     American Capital aka Great American Capitol , a  
    Nevada Corporation.

1                   Defendants..

Case No. 10-cv-1385-JCM-PAL

STIPULATION AND ORDER  
PROTECTING CONFIDENTIAL  
SETTLEMENT INFORMATION

CHRISTENSEN JAMES & MARTIN  
7440 W. SAHARA AVE., LAS VEGAS, NEVADA 89117  
PH: (702) 255-1718 § FAX: (702) 255-0871

2                   The undersigned parties, hereby stipulate as follows:

- 3      1. Shrader and Martinez Construction, Inc.; Richard Raoul Nieto; and Claudia Bammer  
4      (collectively "Defendants") have requested information from the Plaintiffs showing how  
5      much money from specific parties has been received in this litigation by the Plaintiffs  
6      through settlement;
- 7      2. The Plaintiffs are willing to provide the information but desire a protective order from the  
8      Court to ensure that there are no violations of any confidentiality provisions that may  
9      exist in settlement documents and that there are no violations of any confidentially  
10     expectations that the settling parties may have had;

3. The Defendants therefore agree that they will hold in strict confidence and not share,  
disseminate, or make available any settlement information between the Plaintiffs and any  
other party that may be disclosed to them now or in the future;
4. Unless disclosure is ordered by a court, the Defendants further agree that they will hold  
the Plaintiffs completely harmless (including but not limited to actual damages, incidental  
damages, legal fees and costs) from any intentional or negligent disclosure of the  
confidential information that results from their conduct or lack thereof.

Dated this 4th day of March, 2014.

## CHRISTENSEN, JAMES & MARTIN

PICHARD PARRY KOLBE

By: *Evan L. James*

Evan L. James, Esq.  
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By: Zachariah B. Parry

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Counsel for SMC

**Richard Nieto  
6943 Cedar Basin Ave.  
Las Vegas, NV 89142  
In Proper Person**

Claudia Boenigk

Claudia Bammer  
6943 Cedar Basin Ave.  
Las Vegas, NV 89142  
In Proper Person

ORDER

JT IS SO ORDERED.

**United States District Court Magistrate Judge**

Peggy A. Leen

Dated: April 9, 2014

Submitted by:

## CHRISTENSEN, JAMES & MARTIN

By: *Evan L. James*

Evan L. James, Esq.  
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